

Life      Death

*Mitigation*  
Balancing the  
Scales of Justice

Toni Knox, LCSW  
Licensed Clinical  
Social Worker

*Member*

National Association of  
Social Workers

National Alliance of  
Sentencing and  
Mitigation Specialists

National Legal Aid &  
Defender Association

Texas Criminal Defense  
Lawyers Association

mitigationpartners.com

# *Mitigation Partners*

P O Box 832073 Richardson, Texas 75083-2073 (214) 415-6753 tonikn@mindspring.com

October 27, 2008

Mr. James W. Volberding  
Attorney & Counselors at Law  
110 North College Avenue  
Suite 1850  
Tyler, Texas 75702

Re: Danielle Simpson

Dear Wes:

Attached you will find my second invoice in the amount of \$3,999.68 . I would request that additional funds be authorized to complete the social history and possibly interview some final witnesses as described below.

Since the last allocation of funds there have been several trips to Palestine and the surrounding area. Additionally there have been several more interviews with family members, teachers and people with knowledge of Danielle's history. I also made a trip to Livingston to visit with Danielle on October 14, 2008 at the Polunsky Unit. As expected, there have been several hours spent documenting the results of all of the recent activity which is being forwarded to your office for review.

At present there remain several people who are candidates to be interviewed. However, the scope of their knowledge concerning Danielle is unknown and the reason for interviewing them is based on their reported history with Danielle or because we have been referred to them by other people we have interviewed. Below is a list of potential candidates for interview and their connection to Danielle.

### **Remaining Potential Interviewees**

Reverend John McKnight and wife- they are reported to have known Danielle most of his life. He is affiliated with The Church of the Living God in Crockett, TX.

Linda Hornbuckle- she was a youth minister at grace Temple Church and was referred by both Pastor Crosby and Rev. Preston White as someone who had a

lot of contact with Danielle. There have been attempts to contact her however she was not at home.

Billy Carwell- he was referred by DeWayne Simpson, Danielle's cousin. He and his wife lived next door to Danielle's family for several years. He is reported to still live in the Palestine area.

Ashley Gibson- she is a former girlfriend of Danielle. The extent of her knowledge is unknown. She is reported to live in Tyler.

Dora Estell- she is a teacher in the Grapeland School District that is reported to have taught Danielle.

Dion Birks- a teacher in the Grapeland School District that is reported to have taught Danielle.

Rodney Stephens- a classmate of Danielle when he attended Westwood High School.

Gerald Turner- a classmate of Danielle when he attended Westwood High School.

I have no way of telling if the above people can be located and interviewed. I believe that most of the important people in Danielle's life have been interviewed. The only way to find out if the above witnesses have important information is to actually get in front of them in an interview.

If you still believe that my testimony will be beneficial, additional funds will be necessary for time and travel.

Please let me know as soon as possible if you want me to continue to pursue the interviews.

Sincerely,



Toni Knox

# *Mitigation Partners*

2200 Shannon Lane  
Richardson, Texas 75082  
(214) 415-6753

<b>DATE</b>	<b>INVOICE #</b>
10/27/2008	132

**BILL TO**

## CASE REFERENCE

---

<b><u>Description of Task</u></b>	<b><u>Date</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Total</u></b>
Travel Time - Dallas/Livingston/Dallas	10/13/08	4.5	\$50.00	\$225.00
Interview/Documentation - DS, TC DH	10/14/08	5	\$75.00	\$375.00
Research for Guards	10/20/08	1.5	\$75.00	\$112.50
Documentation for Attorney/Expert	10/21/08	1.75	\$75.00	\$131.25
Travel - Dallas/Palestine	10/21/08	4.5	\$50.00	\$225.00
Interviews (JB, CH, JN, CD, KS, BS)	10/21/08	7	\$75.00	\$525.00
Social History Documentation	10/22/08	4	\$75.00	\$300.00
Travel - Palestine/Dallas	10/22/08	4.5	\$50.00	\$225.00
Interviews (RO, BF, JS)	10/22/08	5	\$75.00	\$375.00
Documentation - Palestine Interviews social history	10/23/08	5	\$75.00	\$375.00
Social History Documentation	10/24/08	3.4	\$75.00	\$255.00
Travel - Dallas/Palestine/Dallas	10/25/08	5.5	\$50.00	\$275.00
Interviews (DS, RW, BJ,GM)	10/25/08	4.5	\$75.00	\$337.50
Documentation	10/26/08	1.5	\$75.00	<u>\$112.50</u>
<b>Total Hours</b>		<b>57.65</b>		<b>\$3,848.75</b>
<b>Expenses</b>				<b>\$150.93</b>
<b>Total Hours and Expenses</b>				<b><u>\$3,999.68</u></b>

**Danielle Simpson**

Hotel - Livingston (2 Cases = 1/2 room of \$109.56)	10/13/08	\$54.78
Database searches	10/20/08	\$14.00
Hotel - Palestine	10/21/08	\$71.15
Database searches	10/21/08	\$7.00
Database searches	10/22/08	\$4.00

---

**Total** **\$150.93**